

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

WEIFANG TENG YI JEWELRY TRADING)	
CO, LTD.,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:18-cv-04651
)	
INTUII, LLC AND JENS SORENSEN,)	
)	
)	
Defendants.)	Hon. John F. Kness
)	Magistrate Hon. Jeffrey T. Gilbert

**MOTION FOR EXTENSION OF TIME TO FILE REPLY IN SUPPORT OF MOTION TO
COMPEL**

COME NOW Defendants Jens Sorensen and Intuii, LLC, by and through counsel, and :

1. On September 21, 2022, the Court entered an Order setting a briefing schedule for Defendants' Motion to Compel the Deposition of Teng Guangyao. [ECF No 386]. Defendants were to file their motion by October 7, 2022, which they did. [ECF No. 388]
2. Plaintiff was ordered to file its response in opposition by November 21, 2022.
3. Defendants were ordered to file their reply by November 4, 2022.
4. On November 2, 2022, Defendants sent an email to counsel for Plaintiff to determine whether Plaintiff would agree to an extension for the filing of Defendants' reply through November 17, 2022. Counsel for Plaintiff responded via email on that date indicating that he would not agree to any such extension. (Ex. A)
5. The current briefing schedule includes Plaintiff's Motion for Leave to File an Amended Complaint. Counsel for Plaintiff sought an extension of time to file a reply in support of said motion on November 2, 2022 due to counsel's illness. The reply

brief had been due that day, and counsel for Plaintiff Defendants did not oppose the requested extension. Defendants filed a Response to Plaintiff's Motion for Extension of Time indicating to the Court that they did not oppose the requested extension. [ECF No. 393] Plaintiff requested an extension through November 11, 2022 – Veteran's Day. The requested extension results in a due date of November 14, 2022.

6. The extension requested by Defendants for their reply brief on the Motion to Compel extends the briefing schedule in equal measure and adds 3 days to the current schedule.
7. This extension of time is not being sought for the purpose of delay or frustration of the progress of this matter.
8. This extension will not unduly burden Plaintiff.

WHEREFORE, Defendants Intuui and Jens Sorensen respectfully request that this Court grant their Motion for Extension of Time to file their reply in support of their Motion to Compel [ECF No. 388] through November 17, 2022.

Respectfully Submitted,

/s/ Erin K. Russell

Erin K. Russell
The Russell Firm
833 W. Chicago Avenue, Suite 508
Chicago, IL 60642
312-994-2424
erin@russellfirmip.com

/s/ Jonathan LA Phillips

Jonathan LA Phillips (IL 6302752)
PHILLIPS & BATHKE, P.C.
4541 North Prospect Road Suite 300A
Peoria Heights, Illinois 61616
Tel: (309) 643-6518x701
Email: jlap@pb-iplaw.com

Counsel for Defendants Intuui, LLC and Jens Sorensen

CERTIFICATE OF SERVICE

This is to certify that on November 4, 2022, this document was filed with the Court via the CM/ECF electronic filing system, thereby serving it upon all counsel of record.

/s/ Erin K. Russell